

To: Hylton Jackson[hylton.jackson@dnr.iowa.gov]
Cc: Nazar, Kristen[Nazar.Kristen@epa.gov]; Law, Preston[law.preston@epa.gov]
From: Howell, Tonya
Sent: Fri 9/1/2017 5:01:37 PM
Subject: RE: Des Moines TCE Building Demo EE/CA, v2 (Aug. 22, 2017)

Hylton, thanks for your comment. I certainly understand your concern regarding the different treatment of the waste in the Maintenance Building and the foundation of Building 4. We had several discussions with RCRA and it is our understanding that according to the Regs contaminated materials in those two buildings would need to be handled as listed waste, unless the debris contained no pesticide residue or contained such low levels of pesticides that a 'contained in/contained out' designation would apply. However, given your concern, we will have further discussions with RCRA to see if there is anything we missed besides a possible 'contained in/contained out' designation that would allow the waste in those buildings to be handled in the same fashion as the other building materials. EPA understands IDNR's general concern regarding Building 4 and the Maintenance Building being treated as listed waste given the suspected low level of contamination that these building foundations may contain. If IDNR has additional information EPA should consider, or our understanding of IDNR's position is incorrect, please let us know. As stated above, we will continue to work with EPA's RCRA program on this issue. In the meantime, we are moving forward with the EE/CA. If we obtain different information during the public comment period, we can make revisions to the waste handling prior to the actual removal action.

Tonya Howell

Remedial Project Manager

Superfund Redevelopment Initiative Coordinator

SUPR/FFPC

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From: Jackson, Hylton [mailto:hylton.jackson@dnr.iowa.gov]
Sent: Thursday, August 31, 2017 1:50 PM
To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Alex Moon <alex.moon@dnr.iowa.gov>; Amie Davidson <amie.davidson@dnr.iowa.gov>; David Scott <david.scott@dnr.iowa.gov>; Mel Pins <mel.pins@dnr.iowa.gov>; Johnson, Susan <susan.johnson@dnr.iowa.gov>; william.ehm@dnr.iowa.gov

Subject: Re: Des Moines TCE Building Demo EE/CA, v2 (Aug. 22, 2017)

Tonya,

I apologize for being a little late with this. My only significant comment is regarding the "listed hazardous waste" classification of the aldrin contaminated Maintenance Building and Building 4 concrete pads. (see attached "DICO EECA comment"). It now appears there may be alternatives to that approach which the Iowa DNR may support (see attached "Dico Haz Waste Determination Memo") Let me know if you need a hard copy of my comments.

On Wed, Aug 23, 2017 at 11:59 AM, Howell, Tonya <Howell.Tonya@epa.gov> wrote:

Hylton, find attached the revised EE/CA for the Des Moines TCE site. Although there were quite a few revisions from the previous version, there are no real substantial changes. We are still hoping to get this document out for public comment by the end of the month. I will be out of the office Thursday through Monday, so if you can review and provide me any feedback by COB Monday, August 28th, it would be greatly appreciated. I should be sending the revised Final Report later today.

Tonya Howell

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Hylton Jackson | Environmental Specialist

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